



REDACTED – FOR PUBLIC INSPECTION

Via ECFS

June 29, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket 14-58, ETC Annual Report and Certification
Shidler Telephone Company, Study Area Code 432023**

Dear Ms. Dortch:

Pursuant to sections 54.313 and 54.422 of the Commission's Rules Shidler Telephone Company hereby submits its annual Form 481. Shidler Telephone Company seeks confidential treatment of its financial information under the FCC's protective Order for section 54.313(f)(2)¹ and is filing a redacted version in the Electronic Comment Filing System.

Respectfully submitted,


Brooke Grimshaw
Sr. Financial Consultant

¹ In the Matter of Connection America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58. Protective Order, DA 16-296, rel. March 22, 2016. ("Protective Order").

FCC Form 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Jill Kuehny
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	jkuehny@kanoklanetworks.com
Form Type		54.313 and 54.422

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(200) Service Outage Reporting (Voice) Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

<300> Unfulfilled service request (voice)	0
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<310> Detail on attempts (voice)	Name of Attached Document
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<320> Unfulfilled service request (broadband)	0
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<330> Detail on attempts (broadband)	Name of Attached Document
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(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
432023OK510 . pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	432023OK610.pdf

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**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code 432023

<015>	Study Area Name	SHIDLER TEL CO
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<020>	Program Year	2018
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<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
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6208455682 ext.

<035> Contact Telephone Number - Number of person identified in data line <030>

<039> Contact Email Address - Email Address of person identified in data line <030> jkuehny@kanoklanetworks.com

<701> Residential Local Service Charge Effective Date

<702> Single State-wide Residential Local Service Charge

[illegible]

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
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[illegible]

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(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com
<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	Name Not Available
<812>	Operating Company	KanOkla Telephone Association

[illegible]

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432023
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

Yes

Osage Nation

4320230K920.pdf

Name of Attached Document

[illegible]

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
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<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

432023OK1210.pdf

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation Data Collection Form <i>Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers</i>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2024A>	Round 2 Recipient of Incremental Support?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2024B>	Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2025A>	Round 2 Recipient of Incremental Support?	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>	
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	<div style="border: 1px solid black; width: 200px; height: 60px; margin: 0 auto;"></div>
<2015>	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)		<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto;"></div>

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
--	--

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		432023OK3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input checked="" type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	432023OK3017.pdf
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or		<input type="checkbox"/>
(3020)	(2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3021)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3022)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

REDACTED - FOR PUBLIC INSPECTION

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REDACTED

[The Financial Statement of Shidler Telephone Company filed pursuant to 47 C.F.R. § 54.313(f)(2) is redacted in its entirety as Highly Confidential Information]

(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
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<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	432023
<015> Study Area Name	SHIDLER TEL CO
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<035> Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>TCA, Inc</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: TCA, Inc	
Name of Reporting Carrier: SHIDLER TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 06/29/2017
Printed name of Authorized Officer: Jill Kuehny	
Title or position of Authorized Officer: CFO	
Telephone number of Authorized Officer: 6208455682 ext.55	
Study Area Code of Reporting Carrier: 432023	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: SHIDLER TEL CO	
Name of Authorized Agent Firm: TCA, Inc	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date: 06/29/2017
Name of Authorized Agent Employee: Brooke Grimshaw	
Title or position of Authorized Agent or Employee of Agent: Senior Financial Consultant	
Telephone number of Authorized Agent or Employee of Agent: 7192664334 ext.	
Study Area Code of Reporting Carrier: 432023	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

Shidler Telephone Company

Study Area Code 432023

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband Service

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Shidler Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with current service quality and consumer protection provisions under state and federal law. These provisions include, but are not limited to, the following: 1) the minimum directory requirements (OAC 165:55-7-1(e) (1); 2) the Truth-in-Billing Rules 47 CFR § 64.2401, as required in the OCC

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

rules at OAC 165:55-9-1; 3) CPNI rules, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

For its broadband service, Company hereby certifies that while there are no applicable state broadband service quality standards and consumer protection rules yet established under the Oklahoma Administrative Code, the Company discloses rates, terms and conditions on its public web site and the Company complies with federal and state customer protection standards generally applicable to all businesses operating in Oklahoma. In addition, the Company adheres to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.

Shidler Telephone Company

Study Area Code 432023

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and
Broadband**

Shidler Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).¹ The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, the Company is able to function under emergency operations in accordance with Title 165, Chapter 55 of the Oklahoma Corporation Commission (OCC) regulations, which include the following subparts specific to emergency operations and adequacy of equipment:

1. 165:55-13-20. Responsibility for adequate and safe service
2. 165:55-13-22. Emergencies
3. 165:55-13-23. Adequacy of service
4. 165:55-13-24. Adequacy of equipment
5. 165:55-13-50. Service standards; sufficient operating and maintenance force
6. 165:55-13-53. Restoration of service plan

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

These rules require telecommunications service providers to maintain their networks and facilities so as to render safe, efficient, and continuous service, and to make adequate provision for emergencies in order to prevent interruption of continuous telecommunications service. The OCC rules also require that telecommunications service providers equip their central office facilities with an emergency power source, either on the premises or available on short notice. Finally, the OCC rules require all telecommunications service providers to have a written restoration of service plan, available for review upon request. The Company complies with all of the aforementioned OCC rules and federal regulations.

While these regulations do not specifically apply to broadband providers and services, the Company's Restoration of Service Plan and emergency power and facilities support both voice and broadband network equipment in the event of an emergency situation.

REDACTED - FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

<701> Residential Local Service Charge Effective Date
<702> Single State-wide Residential Local Service Charge

1/1/2017

<703>

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com

[illegible]

REDACTED - FOR PUBLIC INSPECTION

(800) Operating Companies Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	432023
<015>	Study Area Name	SHIDLER TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Jill Kuehny
<035>	Contact Telephone Number - Number of person identified in data line <030>	6208455682 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jkuehny@kanoklanetworks.com
<810>	Reporting Carrier	Shidler Telephone Company
<811>	Holding Company	Name Not Available
<812>	Operating Company	KanOkla Telephone Association

[illegible]

SHIDLER TELEPHONE COMPANY

PO Box 25

120 Broadway

Shidler, OK 74652

Telephone: (918) 793-2211 Fax: (918) 793-7211

www.shidlertelephone.com/Home.html

Via U.S. Mail, Return Receipt Requested

December 8, 2016

Chief Geoffrev Standing Bear
627 Grandview Avenue
Pawhuska, OK 74056

Dear Chief Standing Bear:

Shidler Telephone Company, an independent telecommunications provider serving the rural Osage area, wishes to engage with the Osage government about broadband availability and opportunities on Tribally-owned lands within our service area. Shidler Telephone Company has been providing telecommunications and broadband services to the Osage area since 1922, and we are interested in learning about any additional telecommunications needs that your community may have.

In November 2011, the Federal Communications Commission (FCC) comprehensively reformed the Universal Service Fund (USF) which helps companies like Shidler Telephone Company provide state-of-the-art communications services in high-cost and rural areas. Among the reforms, the FCC adopted a rule requiring Eligible Telecommunications Carriers who receive high-cost USF support to engage **annually** with Tribal leaders about broadband deployment on Tribally-owned lands and report on five specific outreach activities. In July 2012, the FCC's Office of Native Affairs Policy (ONAP) issued specific guidance on outreach and engagement activities between telecommunications providers and Tribal governments.

Shidler Telephone Company is pleased to inform you that our company provides telephone and internet/DSL services within the Osage County. Shidler Telephone respectfully invites you and other leaders from the Osage government to discuss additional ways that we can meet your telecommunications and broadband needs. Specifically, Shidler Telephone would like to discuss the following items:

- Needs assessment and deployment planning focused on anchor institutions (such as schools, libraries and health centers);
- Feasibility and sustainability planning;
- Marketing services in a culturally sensitive manner;

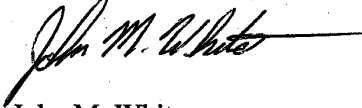
- Rights of way, permitting, facilities siting, environmental and cultural preservation processes;
- Compliance with Tribal business licensing requirements.

As Shidler Telephone Company already provides internet services to 100% of our coverage area, we believe many of the items above will not require an extensive discussion. However, Shidler Telephone Company is interested in learning whether your community has any specific broadband needs that our company may be able to meet, depending on the scope and scale of the project. For example, are there any needs such as distance learning or tele-medicine that we could help facilitate? We also want to make sure that we continue to respect your cultural heritage, property rights, business customs, and any other rules and procedures of your government.

Shidler Telephone Company is a locally-owned company headquartered in Shidler, Oklahoma and we have been serving this area for 94 years. We are dedicated to serving and employing members of our community and we want to ensure that the Osage is well served.

Shidler Telephone Company extends this invitation to set up an in-person meeting or conference call with members of your Tribal government at your earliest convenience. Please contact President John White if you are interested in coordinating such a meeting. We look forward to discussing these important issues with you.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. White", with a long horizontal flourish extending to the right.

John M. White
President

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SHIDLER OK 74652
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Sent To
 Chief Geoffrey Standing Bear
 Street, Apt. No.,
 or PO Box No. 627 Grandview Ave
 City, State, ZIP+4
 Pawhuska, OK 74056

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) Mark Scham</p> <p>C. Date of Delivery 12-12-16</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Chief Geoffrey Standing Bear 627 Grandview Ave Pawhuska, OK 74056</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail[®] <input checked="" type="checkbox"/> Priority Mail Express[™] <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p> <p>7007 3020 0001 9274 2372</p>	

PS Form 3811, July 2013 Domestic Return Receipt

FCC Form 481 Certifications

FCC Form 481 Line 1200
Terms and Conditions for Lifeline Customers
Shidler Telephone Association

Line 1200: Terms and Conditions for Lifeline Customers

Lifeline subscribers receive unlimited local calling at no additional cost. Shidler Telephone Company complies with state and federal rules/regulations concerning Lifeline programs. Toll calls are charged at standard rates.

MILESTONE CERTIFICATION

6/9/2017

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Room TW-A325
Washington, D.C. 20554

Re: Form 481 Line 3010 - Milestone Certification Pursuant to 47 C.F.R. § 54.313(f)(1)(i)

Dear Ms. Dortch:

Shidler Telephone Company, Study Area Code 432023, in accordance with 47 C.F.R. § 54.313(f)(1)(i) of the Commission's rules, hereby certifies that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time.

Respectfully submitted,


Jill Kuehny
CFO

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REDACTED - FOR PUBLIC INSPECTION

REDACTED

[The Financial Statement of Shidler Telephone Company filed pursuant to 47 C.F.R. § 54.313(f)(2) is redacted in its entirety as Highly Confidential Information]